

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROCHE FREEDMAN LLP,

Plaintiff,

v.

JASON CYRULNIK,

Defendant.

Case No. 1:21-cv-01746 (JGK)

JASON CYRULNIK,

Counterclaim-Plaintiff,

v.

ROCHE FREEDMAN LLP, KYLE ROCHE,
DEVIN FREEDMAN, AMOS FRIEDLAND,
NATHAN HOLCOMB, and EDWARD
NORMAND,

Counterclaim-Defendants.

DECLARATION OF JONATHAN P. BACH

I, Jonathan P. Bach, declare as follows:

1. I am a partner at the law firm Shapiro Arato Bach LLP, and counsel for Plaintiff and Counterclaim-Defendants Roche Freedman LLP, Devin Freedman, Amos Friedland, and Edward Normand in the above-captioned action.

2. I submit this declaration in support of Plaintiff and Counterclaim-Defendants' Response to Defendant's Objection to Magistrate Judge Netburn's Order Dated December 9, 2022.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition of Edward Normand, dated September 13, 2022.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of Amos Friedland, dated September 12, 2022.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the deposition of Nathan Holcomb, dated September 29, 2022.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the deposition of Kyle Roche, dated September 15, 2022.

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the deposition of Devin Freedman, dated September 14, 2022.

8. Attached hereto as Exhibit 6 is a true and correct copy of an email thread between my colleague, Alice Buttrick, and Kevin Cyrulnik (who is counsel for Defendant Jason Cyrulnik), dated December 29–30, 2022.

9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the deposition of Roche Freedman LLP, dated August 22, 2022.

10. Attached hereto as Exhibit 8 is a true and correct copy of a letter from Sean Hecker to Marc Kasowitz, dated August 17, 2021.

I declare under penalty of perjury that the above is true and correct.

Dated: January 31, 2023
New York, NY

/s/ Jonathan P. Bach
Jonathan P. Bach
SHAPIRO ARATO BACH LLP
500 Fifth Avenue, 40th Floor
New York, NY 10110
Tel: (212) 257-4897
Email: jbach@shapiroarato.com

*Counsel for Plaintiff / Counterclaim-Defendant
Roche Freedman LLP, Counterclaim-Defendants
Devin Freedman, Amos Friedland, and Edward
Normand*